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June 11, 2020

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. David Pike, Case No. 17-cr-630 (ER)

Dear Judge Ramos:

This firm represents David Pike who has been charged in a criminal information with conspiracy to commit bank fraud in violation of Title 18 USC §371. A change of plea control date is currently set for June 24, 2020.

Given the current coronavirus pandemic and the nationwide shutdown, we request that the guilty plea control date be continued for approximately 90 days. Undersigned counsel and Mr. Pike, who lives with his wife and two children, have followed appropriate sheltering and distancing procedures since the onset of the coronavirus crisis and are reluctant to travel unnecessarily until safe to do so. In addition, since counsel and the defendant have sheltered in place in different parts of the country for the past 10 weeks, the ability to finalize the expected plea agreement has been impacted. The requested continuance will afford the parties the time necessary to finalize plea negotiations and safely appear before the court.

Undersigned counsel has conferred with Assistant United States Attorney Nicholas Folly, who consents to the requested continuance on behalf of the United States. In addition, Mr. Pike agrees that the time between June 24th and the new control date be excluded from Speedy Trial.

Therefore, it is respectfully requested that the court enter an order continuing the June 24, 2020, change of plea control date for approximately 90 days.

Respectfully submitted,

/s/ MARTIN R. RASKIN